April 7, 2006

Technical Specification Task Force
11921 Rockville Pike, Suite 100
Rockville, MD 20852

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING TSTF-484, REVISION 0, "USE OF TS 3.10.1 FOR SCRAM TIME TESTING ACTIVITIES"

Dear Members of the TSTF,

By letter dated May 5, 2005, the Boiling Water Reactors Owners Group (BWROG) submitted TSTF-484, Revision 0, "Use of TS 3.10.1 for Scram Time Testing Activities". The Nuclear Regulatory Commission staff has been reviewing the submittal and has determined that additional information is needed to complete its review. The specific questions are found in the enclosed Request for Additional Information (RAI). A response to this RAI is requested to be provided within 30 days.

Sincerely,

/RA/
Thomas H. Boyce, Chief
Technical Specifications Branch
Division of Inspections & Regional Support
Office of Nuclear Reactor Regulation

Enclosure:
RAI

cc: P. Infanger, BWOG
M. Crothers, BWROG
B. Woods, WOG/CE
W. Sparkman, WOG
D. Hoffman, EXCEL
B. Mann, EXCEL
J. Riley, NEI

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DATE	04/07/2006		04/07/2006	

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REQUEST FOR ADDITIONAL INFORMATION (RAI)

REGARDING TSTF-484, REVISION 0, "USE OF TS 3.10.1 FOR SCRAM TIME TESTING ACTIVITIES"

TECHNICAL SPECIFICATIONS TASK FORCE (TSTF)

By letter dated May 5, 2005, the Boiling Water Reactors Owners Group (BWROG) submitted TSTF-484, Revision 0, "Use of TS 3.10.1 for Scram Time Testing Activities". The Nuclear Regulatory Commission (NRC) staff has the following questions regarding the information provided:

1. LCO 3.10.1 Rev 3.1a would allow testing in Mode 4 with average reactor coolant temperature drifting greater than 200F as a result of decay heat. Primary containment requirements are relaxed in LCO 3.10.1 Rev 3.0 with the reasoning in the TS Bases that average reactor coolant temperature is greater than 200F as a result of testing and not due to significant decay heat. Please explain why it is acceptable to be in Mode 4 (with average reactor coolant temperature greater than 200F) vice Mode 3 with the presence of decay heat contributing to an increase in the average reactor coolant temperature.

2. LCO 3.4.7 "RCS Specific Activity", is normally not required in Mode 4 because the Reactor is normally not pressurized. Please provide justification for not including LCO 3.4.7 under LCO 3.10.1 Rev 3.1a requirements when in Mode 4 with average reactor coolant temperature greater than 200F.

3. The Bases for TS 3.10.1 Rev 3.1a discusses conducting other unnamed testing while the TS 3.10.1 Rev 3.1a specifically mentions conducting only inservice leak or hydrostatic tests and control rod scram time tests. Please elaborate on the intent of the TS and Bases as written with regards to "other testing".

4. The use of the verbiage "as a consequence of" in the LCO under TS 3.10.1 Rev 3.1a could result in steady state Mode 4 with reactor coolant temperature > 200F even though testing is over and no longer being conducted. This seems to be the reasoning for eliminating the statement in the Bases for TS 3.10.1 Rev 3.0 which states that normal Mode 4 requirements are in effect immediately prior to and immediately after LCO 3.10.1 operations. Please elaborate on what would require returning to normal Mode 4 requirements after testing is completed.

Enclosure

TSTF Address List

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